
APPENDIX B

Comment Analysis of Scoping Comments

Stony Creek Project

Forty-four commenters responded during the Stony Creek Project's scoping period of November 5 to December 5, 2012. Their comments were analyzed by the North Zone Interdisciplinary Team on January 17, 2013 and an analysis code assigned to each concern (see Table B). The original comments are found in the Project Record.

Comment Analysis Codes

1. Outside the scope of the proposed action
2. Already decided by law, regulation, Forest Plan, or other higher level of decision
3. Irrelevant to the decision to be made
4. Conjectural and not supported by scientific evidence
5. General comment, suggestions, opinion, or position statement
6. Other agency or partner's consultation, review, advice, recommendations, etc
7. Already considered in the proposed action [Note: TAP is the Travel Analysis Plan]
8. Standard procedure
9. Early Successional Habitat
10. Old Growth
11. Compartment 67, Stand 2
12. OR-7 and OR-8
13. CNF Landscape Restoration Initiative
14. Maintained and temporary roads impacting system trails
15. Non-commercial treatments

Codes 1-6 are standard codes. Comments assigned to these codes are considered to be non-significant issues. Codes 7 and 8 were added as a category for those suggestions that are already proposed or for procedures that are routinely done, respectively. Codes 9-15 were derived from comments specific to this project and warranted further discussion to decide on significance.

Issue Discussion

SC 9. Early Successional Habitat

The issue regarding a need for early successional habitat (ESH) within the Stony Creek Project area was brought up by the public (see Table B). The need was also internally derived by the Interdisciplinary Team (IDT).

Response: A GIS analysis identified no acres currently providing early successional forest habitat (per the RLRMP, stands of 0 to 10 years old) in the project area. The GIS analysis used 2013 as a base year. Per the CNF *Revised Land and Resource Management Plan* (RLRMP), Prescription area 7.E.2 has an early successional forest objective of from 4% - 10%. By treating stands that qualify for regeneration, the Stony Creek Project would result in about 5% early successional forest within the project area. This would help meet the RLRMP objective for early successional forest.

SC 10. Old Growth Stands

Several commenters recommended that Stand 40 in Compartment 66, and Stands 5 and 30 in Compartment 68 be dropped from early successional habitat creation based on their being Old Growth. [Multiple commenters]

Response: According to the RLRMP, there is no existing designated Old Growth in the Stony Creek project area.

Regarding the three stands: The stands' ages given in Table 3 of the Stony Creek Project Scoping Letter dated October 24, 2012 were derived from GIS data. It was discovered after the scoping letter had been sent out to the public that the ages were miscalculated, and were likely much younger. Data collected in the field, however, determined their ages to be only slightly younger than that initially reported (see Table below; J. Kincaid, CNF Forester, pers. comm. 2013).

Table: Stand Ages

Compartment	Stand	Age ¹	Age ²
66	40	132	125
68	5	162	150
68	30	162	150

¹ Age as reported in Scoping Letter

² Age as determined from field data

After an additional review of the Old Growth tally sheets for the three stands, and a field visit with Josh Kelly (Western North Carolina Alliance), Sam Evans (Southern Environmental Law Center), Bob Lewis (Forest Service), Jeff Kincaid (Forest Service) and Jim Stelick (Forest Service) on May 15, 2013, it was determined that the three stands in question did meet the criteria in the Old Growth Guidance to be considered Old Growth. Subsequently, the stands will be dropped from early successional forest creation in any alternative(s) to the Proposed Action developed.

SC 11. Compartment 67, Stand 2

The commenters wondered if the specified age of the stand may have been in error; that it is 128 years old instead of 28 years old (as reported in the scoping letter). At the age reported, they felt the stand would be of uncertain commercial value. [Murry et al Letter of 2/29/2012, p. 2.]

Response: The stand's age given in Table 3 of the Stony Creek Project Scoping Letter was derived from GIS data. Data collected in the field determined that Stand 67-2 is 47 years old (J. Kincaid, CNF Forestry Technician, pers. comm. 2013). In addition, the stand's forest type should have been reported as 'White pine' and not 'White oak - Northern red oak – Hickory'.

SC 12. OR-7 and OR-8

The commenters state: "In the project area no roads are being decommissioned but 8.2 miles are being authorized. You give the reason for this authorization as power line access except for two roads OR-7 and OR-8. Please inform us: why are OR-7 and OR-8 being authorized?" [Murry et al Letter of 2/29/2012, p. 3]

Response: Adding the two roads to the system was based on the recommendations and the results of the Stony Creek Travel Analysis Process:

- OR-7 is proposed to be added to the system to provide access to the Dip Site Pond for fire emergencies.
- Or-8 is proposed to be added to the system for power line access and emergency traffic to the Blue Hole recreation site.

SC 13. CNF Landscape Restoration Initiative

The commenter stated: "Through the CNF Landscape Restoration Initiative ("CNFLRI") for the northern districts of the forest, restoration needs have been further studied and identified. In the CNFLRI materials, the agency already has information about this watershed that is relevant to its existing conditions, to the effects of the proposal, and to ecological restoration alternatives. Under NEPA, in its environmental analysis, the agency must forthrightly disclose and consider that information and must consider the reasonable, viable ecological restoration alternatives based upon it." [Irwin et al Letter of 12/5/2012, p. 3]

Response: A copy of the CNFLRI report is included in the project record. In the section entitled "Purpose of the Report" (pp. 3-4) it states the following:

- "The work of the CNFLRI committee does not replace or have authority over the existing Forest Management Plan for the Cherokee National Forest..."
- "... the CNFLRI is developing better data about existing forest conditions, determining needs for restoration efforts and suggesting ideas for how restoration projects could be achieved. All of this work will operate within and under the dictates of the current adopted forest plan."
- "The committee will work collaboratively with the Cherokee National Forest to identify and prioritize the needs for restoration...Results will be compiled and presented as a set of recommendations to the Cherokee National Forest and will hopefully be considered as part of the future management decision."

The Forest shall take into consideration the CNFLRI report as well as other documents used for best available science in the development of project alternatives and their respective analyses.

SC 14. Maintained and temporary roads impacting system trails

The commenter stated that the following temporary trails [roads] would severely impact system trails: Temporary road to stand 72-15 appears to be over Trail 2025 (Taylor Ridge Trail); temporary road to stand 71-8 appears to be at least partially coincident with Trail 2022 (Bartee Trail); and pre-haul maintenance of Road 60682 appears to be coincident with the multi-use (foot, equestrian, and mountain bike) Trail 2026A (Furnace Branch Trail). [Irwin et al Letter of 12/5/2012, p. 6]

Response: Temporary road to stand 72-15: The proposal is to use Forest Service Road 4071 up to the junction with trail 2025. A landing would be placed on Road 4071 with the existing trail being used as a skid road. It should be noted that although currently a Forest Service system trail, the footprint of trail 2025 follows an old skid/temporary road. The proposal is to temporarily re-open the old skid road (trail 2025) to facilitate logging, then, after project completion, to close the temp road, water bar it, reseed and fertilize it, and allow the road to return to its previous trail function.

Temporary road to stand 71-8: Trail 2022 passes through the NE corner of stand 71-8 where few acres of ESH creation are proposed. Harvest activities would not cross the trail. The temporary access road would be constructed on the south side of the stand. The temporary road would not be “coincident” with the trail, but would cross the trail at one junction. The rest of the trail in the vicinity of the temp road would not be impacted. The temp road would be closed, then rehabilitated (see temp road to stand 72-15 above), including where the temp road crosses with the trail, after project completion.

Pre-haul Maintenance on 60682: The proposal is to do pre-haul, during haul and post maintenance on road 60682 to facilitate logging. As with the temporary road to stand 72-15, the road would be closed and seeded after completion of the project, and then allowed to return to its previous trail function.

SC 15. Noncommercial treatments

The commenter suggested that “noncommercial treatments in recently logged stands, for example, could create the same [early successional habitat] benefits for wildlife.”

Response: The Stony Creek project does propose noncommercial treatments in previously logged stands as Crop Tree Release (see Scoping Letter, action item #2). In this treatment, the Forest Service would release a single tree every 20 feet within two stands (total 13 acres). The resulting gap, however, would not provide adequate light and/or space to create ESH. In addition, the temporary gap would quickly be filled in by neighboring trees. While the treatment would provide a more open habitat condition, it would not provide the same benefits to wildlife that utilize early successional habitat.

From the discussion above, the following issues were considered to be directly or indirectly caused by implementing the Proposed Action:

SC 9. Lack of Early Successional Habitat

SC 10. Old Growth Stands

Table B: Stony Creek Project Comment Analysis

Commenter	Comment	Disposition
Rick Bowers	Supports project	SC 5
	Wish there was more [early successional habitat] planned: 383 ac. out of 8,299 is not enough.	SC 9
	Ruffed grouse population concern	SC 5
Jim Webb	Supports project	SC 5
	Create the much needed early successional habitat.	SC 9
TDEC, Division of Remediation	General comment	SC 5
Devin Ceartas*	Forests undergo succession at their own pace. They don't need logging to regenerate.	SC 5
	The two old-growth stands (stands 5 and 30, compartment 68) should be left alone.	SC 10
	Herbicides are unnatural, toxic, and can have negative effect on water quality and wildlife.	SC 5
	Expense of road building/maintenance, herbicides, and mechanical release poor uses of public funds.	SC 5
* 34 individuals provided comments exactly as Mr. Ceartas presented them. Disposition of their comments would be the same as those for Mr. Ceartas above. See scoping comments attachment below for a list of individuals.		
Davis Mounger (Heartwood)	Many of the stands in the Stoney Creek watershed are secondary growth...Left alone over the next few decades, they will begin a gradual process of... regeneration and the development of a three-dimensional age structure.	SC 5
	The impacts of logging equipment stand to reduce soil quality through compactions...temporary roads built for logging will also contribute to this.	SC 5
	We are concerned about canopy opening on a stand level and the potential effects on soil and hydrological cycles.	SC 5
	The two stands that are 162 years old (stands 5 and 30 in compartment 68) should be left alone.	SC 10
	Herbicides should not be used.	SC 5
	Logging contributes to the disruption of carbon cycles that are contributing to climate change.	SC 5
	Road construction and reconstruction in this project would be expensive and not the best use of taxpayer expenses.	SC 5

Commenter	Comment	Disposition
Davis Mounger (Heartwood)	Another concern is that logging and roads have a potential to act as vectors for invasive species.	SC 5
	Need for clear, specific information in the Environmental Analysis.	SC 2, SC 5
Catherine Murray (Cherokee Forest Voices and TN Chapter of Sierra Club)	A full range of reasonable alternatives, including ecological restoration-oriented alternatives, should be considered in the EA.	SC 2, SC 5
	Any existing old growth patches in the Stoney Creek Watershed should be fully protected.	SC 2, SC 8
	One stand...may have been marked wrong, compartment 67, stand 2 marked at only 28 years of age. We wondered if the stand's correct age may have been 128 as it seems an age of 28 years would not be of commercial value.	SC 11
	FS fails to consider relationship to adjacent private lands when creating new "early succession" areas.	SC 2
	Need to conduct a full, proper travel (roads) analysis process	SC 8 (TAP)
	Why are OR-7 and OR-8 being authorized?	SC 12
	The FS should do away with unnecessary roads in the area and no new roads should be built.	SC 7(TAP), SC 8
	Temporary roads [should be] decommissioned after the project [and] not converted to "linear wildlife openings."	SC 2, SC 7, SC 8
	Protect Tennessee Mountain Treasures	SC 3, SC 5
	Protect Iron Mountain/Mount Rogers Conservation Area	SC 1, SC 3, SC 5
	Protect scenic values, trails, cultural resources, recreation, and tourism values.	SC 2, SC 5, SC 7, SC 8
	Protect water quality	SC 2, SC 5, SC 7, SC 8
	Protect soils from erosion, packing, and other damages.	SC 2, SC 7, SC 8
	We are concerned that cuts proposed on steep slopes and erosion-prone soils could cause erosion and sedimentation of streams.	SC 2, SC 7, SC 8
	Protect plants, wildlife, rare and sensitive communities	SC 2, SC 5, SC 7, SC 8
	Consider "early succession" areas on adjacent private land when determining need for ESH	SC 2

Commenter	Comment	Disposition
Catherine Murray (Cherokee Forest Voices and TN Chapter of Sierra Club)	Project activities may result in the introduction of non-native invasive species.	SC 2, SC 5, SC 7
	Slashdown would contribute to fuels buildup on the site.	SC 5
	Wildlife species and habitat, old growth and archeological inventories need to be current.	SC 2, SC 5
	Cumulative effects should be analyzed and considered in the EA.	SC 2, SC 8
	The EA should disclose and consider all costs ... and all economic benefits of all alternatives	SC 2, SC 8
	Monitoring needed.	SC 2, SC 8
Hugh Irwin (The Wilderness Society)	The primary focus...should be ecological restoration.	SC 5
	The regenerated stands will not have the composition, structure, function or productivity (see Goal 19) of native forest ecosystems.	SC 5
	The landscape character of [the Flint Mill Tennessee Mountain Treasure] area should be conserved and restored to allow it to recover to natural all-age forest conditions.	SC 5
	The limited and dead-end roads accessing the Flint Mill area that have been placed on the road system should be decommissioned.	SC 5, SC 7 (TAP)
	Through the CNF Landscape Restoration Initiative (“CNFLRI”) for the northern districts of the forest, restoration needs have been further studied and identified. In the CNFLRI materials, the agency already has information about this watershed that is relevant to its existing conditions, to the effects of the proposal, and to ecological restoration alternatives. Under NEPA, in its environmental analysis, the agency must forthrightly disclose and consider that information and must consider the reasonable, viable ecological restoration alternatives based upon it.	SC 13
	The Stoney Creek area forms an essential landscape conservation corridor along the main Appalachian chain that is essential for unfragmented wildlife habitat	SC 5
	Protecting and enhancing [the Holston Mountain Ridge] landscape linkage should be a primary consideration in project development for this area.	SC 5

Commenter	Comment	Disposition
Hugh Irwin (The Wilderness Society)	The Forest Service has an obligation to address climate change.	SC 8
	The proposed activities will degrade, rather than promote, adaptation and resilience to climate change...	SC 5
	The road system in the Stoney Creek area should be the focus of watershed and stream restoration work. This should be addressed in the TAP and the project development.	SC 7, SC 8 (TAP)
	Temporary trails would severely impact system trails. The temporary road to stand 72-15 appears to be over Trail 2025 (Taylor Ridge Trail). The temporary road to stand 71-8 appears to be at least partially coincident with Trail 2022 (Bartee Trail). And the pre-haul maintenance of Road 60682 appears to be coincident with the multi-use (foot, equestrian, and mountain bike) Trail 2026A (Furnace Branch Trail). The EA must address the short and long-term impacts on these recreation resources of any proposed timbering activities.	SC 14
	The CNF inventory [should] include an expanded Flint Mill area as inventoried roadless.	SC 1, SC 2
	The effects on roadless resources of the proposed activities must be disclosed and thoroughly considered.	SC 1, SC 2
	Concerned with stands having steep slopes: 73-17; 66-40; 68-5; 71-29.	SC 2, SC 7
	Existing old growth should be identified and protected.	SC 8
	Project level old growth surveys should be conducted.	SC 8
	Stands 66-40, 68-5, 68-30, and 71-29 proposed...for regeneration have stand ages that would indicate they could well qualify as existing old growth.	SC 10
	During the Stoney Creek project development, the Forest Service must consider how patches of existing or nearly old growth contribute to...a broadly distributed old growth network and must identify an old growth network consisting of future and existing large, medium, and small old growth patches.	SC 1, SC 2, SC 5, SC 8
Josh Kelly (Western North Carolina Alliance)	Stand ages suggest that [C66/S40, C68/S5, and C68/S30] of forest may meet the definitions of old-growth under the Region 8 Guidance.	SC 10

Commenter	Comment	Disposition
Josh Kelly (Western North Carolina Alliance)	Important to complete proper, thorough old growth surveys in [C66/S40, C68/S5, and C68/S30].	SC 8
	The 2004 Cherokee NF LRMP (p.38) requires the Forest Service to identify old-growth during project planning.	SC 2, SC 8
	If any stands, or portions of stands, are identified as old-growth forest, they should be removed from consideration for logging.	SC 8
	If there is a desire to pursue logging old-growth, I believe this would be a significant impact that should be disclosed and considered in an Environmental Impact Statement.	SC 2, SC 5
	Noncommercial treatments in recently logged stands, for example, could create the same [early successional habitat] benefits for wildlife.	SC 15
Blake Hornsby	There are already so many trees cut down, why more?	SC 2, SC 5
	Forests regenerate themselves naturally through regeneration through succession.	SC 5
	Herbicides are polluting and dangerous and unneeded. [They] kill and harm animals such as birds. Not only does it hurt animals, but it hurts us...and contaminates the water—our drinking water.	SC 2, SC 5
TDEC, Division of Water Resources [rec'd 12/17/12]	Any change in the existing land cover will potentially alter the [surface] water quality that the First Utility District of Carter County utilizes.	SC 4, SC 5

Scoping Comments Attachment

The following people submitted comments during the Stony Creek Project scoping period. Their comments (and subsequent issues) were and are exactly the same as stated by Mr. Ceartas:

J. Ammon	Tony Jones
Stephen Arnold	Prudence Kuhn
Jillian Bar-av	Corina Lang
Richard Benton	Carey Lea
Lucille Bertuccio	Andy Mahler
Van Bunch	Amanda Moore
Douglas Cornett	Eric Morris
Trudy Dunaway-Brown	David Nickell
Mike Englert	Charles Phillips
Dinda Evans	Karolyn Redoutey
Robert Fener	Mary Rice
Jen Fisher	Rita Robinett
Mark M Giese	Paul Schneller
Laura Graves	Lauryn Slotnick
Terri Greene	Steven Chase Spurgeon
Mary Hood	Ruth Stambaugh
Dan Howerzyl	John Weber